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4 Los Angeles, California 90017-2543
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5 Facsimile: (213) 443-3100

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Alex Spiro (*pro hac vice* forthcoming)
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51 Madison Avenue, 22nd Floor
8 New York, New York 10010
Telephone: (212) 849-7000
9

10 Attorneys for Defendants
TESLA, INC., ELON MUSK, BRAD W. BUSS,
11 ROBYN DENHOLM, IRA EHRENPREIS,
ANTONIO J. GRACIAS, JAMES MURDOCH,
12 KIMBAL MUSK, and LINDA JOHNSON RICE

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17
18 IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**NOTICE OF WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR
DEFENDANTS; [PROPOSED] ORDER**

PLEASE TAKE NOTICE that Defendants Tesla, Inc., Elon Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (“Defendants”) have retained Quinn Emanuel Urquhart & Sullivan, LLP to substitute as counsel for Cooley LLP in the above-captioned matter.

Withdrawing counsel for Defendants are:

Patrick Edward Gibbs
Cooley LLP
3175 Hanover Street Palo Alto, CA 94304
Phone: (650) 843-5000
Fax: (650) 849-7400
Email: pgibbs@cooley.com

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1 Joshua Sol Schelly Walden
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4 Phone: (650) 843-5000
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7 Samantha Anne Kirby
8 Cooley LLP
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10 Phone: (650) 843-5000
11 Fax: (650) 849-7400
12 Email: skirby@cooley.com

13 All pleadings, orders and notices should henceforth be served upon the following
14 substituted counsel for Defendants:

15 Alex Spiro (*pro hac vice* forthcoming)
16 QUINN EMANUEL URQUHART & SULLIVAN, LLP
17 51 Madison Avenue, 22nd Floor
18 New York, New York 10010
19 Telephone: (212) 849-7000
20 Email: alexspiro@quinnemanuel.com

21 Michael Lifrak
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24 Los Angeles, California 90017-2543
25 Telephone: +1 213 443-3000
26 Email: michaellifrak@quinnemanuel.com

27 Jeanine M. Zalduendo
28 QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 South Figueroa St., 10th Floor
Los Angeles, California 90017-2543
Telephone: +1 213 443-3000
Email: jeaninezalduendo@quinnemanuel.com

The undersigned parties consent to the above withdrawal and substitution of counsel.

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Dated: December 16, 2021

TESLA, INC.

By: Nathaniel Smith
NATHANIEL SMITH

Dated: December ___, 2021

By: _____
ELON MUSK

Dated: December ___, 2021

By: _____
BRAD W. BUSS

Dated: December ___, 2021

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ROBYN DENHOLM

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IRA EHRENPREIS

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COOLEY LLP

By: _____
PATRICK E. GIBBS

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TESLA, INC.

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NATHANIEL SMITH

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6 Dated: December 12, 2021

By: *Elon Musk*
Elon Musk (Dec 12, 2021 15:34 EST)
ELON MUSK

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BRAD W. BUSS

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TESLA, INC.

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Brad Buss (Dec 13, 2021 17:23 PST)
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Robyn Denholm (Dec 16, 2021 09:52 GMT+11)
ROBYN DENHOLM

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IRA EHRENPREIS

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KMusk (Dec 12, 2021 10:37 MST)
KIMBAL MUSK

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COOLEY LLP

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By: *Linda Johnson Rice*
Linda Johnson Rice (Dec 13, 2021 11:36 CST)
LINDA JOHNSON RICE

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COOLEY LLP

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Dated: December , 2021

TESLA, INC.

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LINDA JOHNSON RICE

Dated: December 16, 2021

COOLEY LLP

By: /s/ Patrick E. Gibbs
PATRICK E. GIBBS

1 Dated: December 16, 2021

QUINN EMANUEL URQUART &
SULLIVAN, LLP

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3
4 By: /S/ Michael T. Lifrak

5 MICHAEL T. LIFRAK

6 * * * * *

7 I hereby attest that I obtained concurrence in the filing of this document from each of the
8 other signatories on this e-filed document.

9 Dated: December 16, 2021

QUINN EMANUEL URQUART &
SULLIVAN, LLP

10
11 By: /S/ Michael T. Lifrak

12 MICHAEL T. LIFRAK

13 * * * * *

14
15 The above withdrawal and substitution of counsel is approved and so ORDERED.

16 Dated: December ___, 2021

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18 _____
JUDGE EDWARD M. CHEN